

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIM. NO. 2:19-cr-20026

HON. GERSHWIN A. DRAIN

v.

D-1 BHARATH KAKIREDDY  
D-2 SURESH REDDY KANDALA,  
D-3 PHANIDEEP KARNATI,  
D-4 PREM KUMAR RAMPEESA,  
D-5 SANTOSH REDDY SAMA,  
D-6 AVINASH THAKKALLAPALLY.

Defendants.

STIPULATION FOR  
CONTINUANCE OF FINAL PRE-TRIAL CONFERENCE, PLEA DATE AND  
TRIAL DATE AND FINDING OF EXCLUDABLE DELAY

The parties, by their undersigned attorneys, stipulate to the following matters: (1) the adjournment of the motion cutoff, final pre-trial conference, and plea cut-off date; (2) the adjournment of the trial date in this matter from trial date May 14, 2019 to the new trial date of July 23, 2019 at 9:00 a.m.; and (3) a finding of excludable delay from May 14, 2019 to July 23, 2019 for the following reasons: (a) to permit the parties additional to negotiate a possible plea agreement; and (b) the parties require additional time to prepare for trial.

The dates are as follows:

Motion cut-off date:	May 3, 2019
Plea Cut-off date:	June 26, 2019 at 2:00 p.m.
Final Pretrial Conference	July 16, 2019 at 3:00 pm.
Jury Trial Date:	July 23, 2019 at 9:00 a.m

The parties agree and stipulate that the additional time is necessary: (a) to permit the parties additional to negotiate a possible plea agreement; and (b) the parties require additional time to prepare for trial.

The parties stipulate that the extended time period, that is from May 14, 2019 to July 23, 2019, shall constitute excludable delay under the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B), in that the parties require additional time to negotiate a possible plea agreement and to adequately prepare for trial.

Pursuant to 18 U.S.C. § 3161(h)(7)(A), the parties agree that the ends of justice served by this delay outweigh the best interest of the public and the defendants in a speedy trial.

Dated: April 3, 2019

IT IS SO STIPULATED:

By: /s/Timothy McDonald w/ Consent  
Timothy McDonald  
Assistant United States Attorney  
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(313) 226 9100  
Dated: April 3, 2019

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Dated: April 3, 2019

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Dated: April 3, 2019

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Dated: April 3, 2019

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Dated: April 3, 2019

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Dated: April 3, 2019

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By: /s/ Edward A. Bajoka  
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Dated: April 3, 2019

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EASTERN DISTRICT OF MICHIGAN  
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ORDER FOR  
CONTINUANCE OF FINAL PRE-TRIAL CONFERENCE, PLEA AND TRIAL  
DATES AND FINDING OF EXCLUDABLE DELAY

Upon this Court's consideration of the parties' stipulation and the Court being apprised of the circumstances,

IT IS ORDERED that the final pre-trial conference and the plea date in this matter shall be adjourned until July 16, 2019 at 3:00 p.m..

IT IS ORDERED that the trial date in this matter shall be adjourned until July 23, 2019 at 9:00 a.m.

IT IS FURTHER ORDERED that the time period from May 15, 2019 to July 23, 2019, shall constitute excludable delay under the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(B)(i),(ii) and (iv). The exclusion of the delay

from the computation of the time within which the trial must commence under the Speedy Trial Act is made pursuant to 18 U.S.C. § 3161(h)(7)(A) and §§ 3161(h)(7)(B)(i), (ii) and (iv), in that the ends of justice served by this delay outweigh the best interest of the public and the defendant in a speedy trial because the failure to grant a continuance would result in a miscarriage of justice and the government requires additional time to compile the prescription data to be used at trial; and all parties, in this complex narcotics case, require additional time to negotiate a plea agreement or prepare for trial, and such need is reasonable.

Dated: April 8, 2019

s/Gershwin A. Drain  
HON. GERSHWIN A. DRAIN  
United States District Court Judge